

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

ROGER TWENHAFEL, d/b/a)	
CONSOLIDATED SERVICES,)	CASE NO: 08-117 GPM
)	
Plaintiff,)	CJRA TRACK: B
)	
v.)	JUDGE: G. Patrick Murphy
)	
STATE AUTO PROPERTY AND)	Jackson County No. 07-L-31
CASUALTY INSURANCE COMPANY)	
)	
Defendant.)	

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Now comes the Plaintiff, Roger Twenhafel, d/b/a Consolidated Services, by and through his attorney, Scott Hendricks, and pursuant to Federal Rule of Civil Procedure 56 and SDIL-LR 7.1, moves this Court for summary judgment in favor of Plaintiff and against Defendant, State Auto Property and Casualty Insurance Company, in all of Plaintiff's Complaint as no material issues of fact are disputed. Attached hereto in support of Plaintiff's motion are copies of the relevant insurance policy, relevant sections of the deposition of Mr. Roger Twenhafel, relevant sections of the deposition of Craig Andrews (Manager of Business Insurance Product for Defendant State Auto Property and Casualty Insurance Company), and Affidavit of Mr. Roger Twenhafel.

Wherefore, Plaintiff prays that the Court grant summary judgment in favor of Plaintiff and against Defendant and award damages in the amount of \$81,678.10 plus prejudgment interest from September 22, 2006 and costs.

Respectfully Submitted,

/s/ Scott P. Hendricks

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Cynthia A. Hagan, 06187140

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was mailed to all parties who have NOT BEEN ELECTRONICALLY NOTIFIED this 30th day of July, 2008 with the correct postage prepaid and deposited in the U.S. Mail in Carbondale, IL.

_____/s/ Monica Reid

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